## AMENDMENT to the DRAWINGS

No amendments or changes to the Drawings are proposed.

# REMARKS

## New Rejections under 35 U.S.C. §112, Second Paragraph

We understand the two different interpretations of our claims as set forth by the BPAI. We believe consideration of a web address with only a single label is unnecessary as we are unaware of any valid web addresses which only have one label, and a single label would not need delimiters (e.g. there would be no other labels to delimit from the single label). So, an interpretation of plurality of labels (e.g. two or more) seems to be appropriate in this context.

However, limiting the claims to require at least two labels, both of which having bidirection characters *within each of the two labels* would be overly restrictive in view of the limitations of the teachings of the cited reference, we believe.

For these reasons, we respectfully submit that the amendment clarifies this matter:

> . . . , said labels containing a plurality of characters wherein each character has a determinate display order or an indeterminate display order, . . .
> . . . within at least one of said plurality of labels each said label, performing inferencing through resolving display directions the direction of indeterminate display order characters by assigning a strong direction left-to-right display order left or right to each indeterminate display order character; . . .

We respectfully request reconsideration in view of this clarifying amendment.

## New Rejections under 35 U.S.C. §101 and 35 U.S.C. §102, First Paragraph

*Characterization of Our Invention as an Algorithm.* In the Decision by the BPAI, Appellant's invention was characterized as an "algorithm" as in a "mental algorithm", which is not patentable subject matter. The BPAI has noted that our paragraph [0089] as published, which corresponds to paragraph [0078], describes our invention as a *"single universal algorithm"*. We respectfully traverse this interpretation of our disclosure, and we submit amendments herein which we believe clarify our disclosure.

While we understand that mental algorithms are not patentable, there are other definitions of the term "algorithm", such as:

**algorithm**

1. = ALGORISM

. . .

2. *Math.* <u>A process, or set of rules,</u> usually one expressed in algebraic notation, now used esp. <u>in computing, machine translation and linguistics</u>.

3. *Med.* A step-by-step procedure for reaching a clinical decision or diagnosis, often set out in the form of a flow chart, in which the answer to each question determines the next question to be asked.

(Retrieved from Oxford English Dictionary at http://www.dictionary.oed.com on Feb. 16, 2009)

We respectfully submit that the second definition is suitable for our interpretation of our disclosure because our invention relates to all three fields of computing, machine translation, and linguistics.   Therefore, in view of our entire disclosure, we respectfully ask for entry of the amendment to the specification to exchange the "algorithm" with the term "computer-implemented process".

It should be noted that the Unicode Bidirection Algorithm is an *algorithm* in the non-computer sense because it is *merely a written description* of a step-by-step method of reordering characters in a natural language passage of text.  The Unicode Bidirection Algorithm is literally a *document* which is not executable – it is left to programmers to adopt the algorithm and implement it, or some form of it, into computer- executable program code.

Our invention, however, is not merely an algorithm, but instead is a computer-implemented method or computer-implemented process.   The logical process it encompasses or comprises is different from the algorithm of the Unicode Bidirection Algorithm written specification.

The cited paragraph of our disclosure does not indicate or imply that our invention consists only of an algorithm, but instead this particular paragraph is describing a method portion of our invention.   We ask that this paragraph be read in light of our entire specification. Methods may be computer-implemented, as is described in our disclosure in the very next paragraph ([0090] as published) *"[t]he disclosed logical methods are preferably realized in*

*software executable by a web server, such as a Java servlet, or by a web client, such as a Java applet."* A computer executing this software (see our paragraph [0035] as published), constitutes a patentable invention. Similarly, this software embodied on a computer memory is an article of manufacture, also subject to patenting.

We respectfully request reconsideration in view of the clarifying amendments made herein which both tie the claim to a specific machine (a computer), a transform a particular article into a different state (receiving into computer memory and displaying on a computer display transforms the electrical, magnetic, and/optical characteristics of an electronic component).

*System Claims.* We have amended the system claims to recite portions of a computer performing the functions of the claim to bring the claim format into compliance with *Ex parte Miyazaki.* We respectfully request reconsideration of these claims as amended.


**Observations of the Merits of the Reversed Rejections under 35 U.S.C. §103(a)**

We believe the present amendment retains the untaught elements, steps, and limitations as previously argued by the Appellant, and as supported, at least in part, by the observations by the BPAI. Whereas the rejections were reversed, Appellant does not expressly or impliedly agree with any conclusions of the BPAI regarding the rejections under 35 U.S.C. §103(a), and silence regarding such conclusions in the present amendment should not be considered agreement. Appellant respectfully reserves the right to traverse these analyses in the case that the Examiner should reinstate the 103 rejections over modified rationale, or make new 103 rejections.

*Confusion between Logical Order of Characters and Logical Order of Labels.* The term "logical order" does not appear in our claims, but appears in our disclosure and our arguments, and was discussed in the Decision. The BPAI has interpreted this term to mean the order of characters in which they would be typed on a keyboard, per the Unicode Glossary.

We respectfully submit that there are two different logical orders to consider here – a first logical order *of characters*, which corresponds with the definition from the Unicode Glossary, and a second logical order *of WWW address labels*, which is not described in the Unicode documents because the Unicode documents are silent regarding WWW addresses.

We have used in our claims the term "original label display order" to represent this

second logical order of labels in order to distinguish from the logical order of characters. We respectfully request reconsideration in view of these differences, and in view of Appellant's right to be his or her own lexicographer for the term "logical order of labels" or similarly "original label display order".

_References to Wikipedia._ We respectfully traverse each reasoning in the Decision of the BPAI which includes, references, or relies upon citations from Wikipedia for at least three reasons. Firstly, the citations taken from Wikipedia are modern and post dated (just two days before the rendering of the Decision), thus they are not prior art and should not be presumed to reflect the state of art nearly seven years ago at our filing date.

Secondly, there is no copyright date on the documents from Wikipedia. Thus, there is no examination policy which supports affording these documents prior art status relative to our filing date.

And, Wikipedia is a community-edited web page, not an professionally edited reference such as a professional journal or university textbook. As such, there is little or no verification of the correctness, accuracy or completeness of the information presented in Wikipedia. As we best understand present-day examination policy, Examiners are prohibited from citing Wikipedia as a reference for these very reasons.

**Request for Indication of Allowable Subject Matter**

We believe we have responded to all new grounds of rejection, but if the Examiner disagrees, we would appreciate the opportunity to supplement our reply.

We believe the present amendment places the claims in condition for allowance.  If, for any reason, it is believed that the claims are not in a condition for allowance, we respectfully request constructive recommendations per MPEP 707.07(j) II which would place the claims in condition for allowance without need for further proceedings.   We will respond promptly to any Examiner-initiated interviews or to consider any proposed examiner amendments.

Respectfully,

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